

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JANE SULLIVAN and P. POES 1-75,
individually and on behalf of others similarly
situated,

Plaintiffs,

v.

THE UNIVERSITY OF WASHINGTON, a
Washington public corporation; ELIZA
SAUNDERS, Director of Public Records and
Open Public Meetings at the University of
Washington, in their official capacity,

Defendants.

NO.

**DECLARATION OF P. POE 1
RE: PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING
ORDER**

DECLARATION OF P. POE 1

I, P. Poe 1, declare as follows:

1. I am a member of the Institutional Animal Care and Use Committee at the University of Washington. I make this declaration based on my personal knowledge.

2. I have been involved with animal research at the UW for a number of years. I have been a member of the IACUC at UW for several years. I also have served in the past on other IACUC committees.

3. One of my important roles on the IACUC is to help ensure the health and well being of animals that are involved in research.

1 4. In order to protect myself from threats and harassment based on my association with
2 service on the IACUC, I am using the pseudonym "P. Poe 1" and requesting to proceed in this
3 lawsuit under that pseudonym.

4 5. I believe that if members of the IACUC are identified by name, address, email, etc.,
5 we will be the subject of harassment and possible threats from persons who oppose animal research.

6 6. I am aware that persons opposed to animal research, including PETA supporters,
7 picketed outside the private home of a person at UW involved in animal research.

8 7. I am aware that members of other IACUC committees have had their pets kidnapped
9 by persons who oppose animal research.

10 8. I have personally witnessed members of the public making angry and threatening
11 comments towards members of the UW IACUC during the public comment period of its meetings.

12 9. If my full name and identifying information were released to the public, I would
13 have concern for my own safety and for the safety of my pet. I believe the release of this
14 information is being sought in order to have members of the public direct mass communications,
15 including harassment or threats, at myself and other IACUC members and animal researchers.

16
17 I declare under penalty of perjury of the laws of the United States that the foregoing is true
18 and correct, and that I executed this declaration on February 22, 2022, at King County, Washington.

19
20 s/ P. Poe 1

21 P. POE 1